

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Review of the Commission's Broadcast and)	MM Docket No. 98-204
Cable Equal Employment Opportunity)	
Rules and Policies)	
To: The Commission		

**JOINT COMMENTS OF THE NAMED STATE
BROADCASTERS ASSOCIATIONS**

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SUMMARY

The State Associations fully support the goal of broad outreach for employment in the broadcast industry. As is well-documented, the State Associations have a long history of assisting radio and television stations to practice, on a voluntary basis, broad outreach in their recruitment efforts. However, the State Associations have had, and continue to have, a difference of opinion with the Commission concerning the agency's regulatory role and actions in this area.

The State Associations remain very concerned about the refusal of the Commission to endorse the Internet as the single widest, most efficient, and most effective methodology for the dissemination of information about job openings. The Commission's refusal unnecessarily forces broadcasters to rely more heavily upon less efficient and less effective dissemination methodologies and, as a consequence, to unnecessarily increase their recordkeeping and reporting burdens. The recordkeeping and reporting burdens that the new EEO Rule creates with respect to full-time positions are apparent and create certain unintended consequences. There should be no genuine dispute that the greater the number of job openings that are subject to the new EEO Rule, the more recordkeeping that is required and thus the more burdensome the new EEO Rule becomes. The new EEO Rule creates new burdens and risks every time a broadcaster seeks to fill a full-time position, and thus the regulation creates a disincentive for the broadcaster to fill the opening. Also, the new EEO Rule increases the paperwork burden in direct proportion to the number of referral sources and methodologies used, as well as to the number of times the notice is repeated for any opening. Thus, the regulation also creates a disincentive for the widest possible and most frequent notice of job openings.

Accordingly, any effort to expand the applicability of the new EEO Rule to part-time positions, which positions turn over much more frequently than full-time positions, will increase

exponentially these problems, thereby resulting not only in fewer job openings to fill overall, but also in less than optimally wide and frequent dissemination of notices as among *all* types of job openings to be filled. This will mean less overall employment in the broadcast industry, and therefore less opportunity for employment regardless of race, ethnicity, and gender.

At bottom, the recruitment, recordkeeping, and reporting requirements of the new EEO Rule favor the economies of scale inherent in consolidation in at least two ways: Consolidation typically means job layoffs which mean fewer job openings which means less paperwork and less regulatory risk. Consolidation also typically means more resources are available to match the burdens and risks created by regulation. The application of the new EEO Rule to part-time positions will increase the current pressure to consolidate. Accordingly, the State Associations strongly recommend that part-time positions be fully exempt from the mandatory recruitment, recordkeeping, and reporting requirements of the new EEO Rule.

The Commission professes to be concerned about the effects of consolidation. Yet at the same time that the Commission is engaged in measuring the effects of consolidation and trying to strengthen individual and smaller group station ownership, so that these owners can survive and compete in the marketplace without having to sell out and consolidate, the Commission seriously undercuts this effort by injecting a new regulatory disincentive for stations to stay independent. The large group owners typically have the resources to bear even the unreasonable burdens of extensive and time consuming recordkeeping and reporting as well as governmental scrutiny. Smaller owners cannot afford either the staff required to meet those unreasonable burdens or the forfeitures likely to arise from EEO-related paperwork shortcomings. Extending these burdens and risks to part-time positions will only exacerbate the problem, resulting in increased consolidation and less competition in the broadcast industry.

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)	
)	
Review of the Commission's)	MM Docket 98-204
Broadcast and Cable)	
Equal Employment Opportunity)	
Rules and Policies)	
To: The Commission		

**JOINT COMMENTS ON
THIRD NOTICE OF PROPOSED RULE MAKING**

The Alabama Broadcasters Association, Alaska Broadcasters Association, Arizona Broadcasters Association, California Broadcasters Association, Colorado Broadcasters Association, Connecticut Broadcasters Association, Florida Association of Broadcasters, Georgia Association of Broadcasters, Hawaii Association of Broadcasters, Idaho State Broadcasters Association, Illinois Broadcasters Association, Iowa Broadcasters Association, Kansas Association of Broadcasters, Kentucky Broadcasters Association, Louisiana Association of Broadcasters, Maine Association of Broadcasters, Maryland/DC/Delaware Broadcasters Association, Massachusetts Broadcasters Association, Michigan Association of Broadcasters, Minnesota Broadcasters Association, Missouri Broadcasters Association, Montana Broadcasters Association, Nebraska Broadcasters Association, Nevada Broadcasters Association, New Hampshire Association of Broadcasters, New Jersey Broadcasters Association, New York State Broadcasters Association, Inc., North Dakota Broadcasters Association, Ohio Association of Broadcasters, Oklahoma Association of Broadcasters, Oregon Association of Broadcasters, Pennsylvania Association of Broadcasters, South Carolina Broadcasters Association, South

Dakota Broadcasters Association, Tennessee Association of Broadcasters, Texas Association of Broadcasters, Utah Broadcasters Association, Vermont Association of Broadcasters, Virginia Association of Broadcasters, Washington State Association of Broadcasters, Wisconsin Broadcasters Association, and the Wyoming Association of Broadcasters (collectively, the “State Associations”), by and through their attorneys, and pursuant to Sections 1.415 and 1.419 of the Commission’s Rules, 47 C.F.R. §§ 1.415, 1.419, hereby jointly comment upon the *Third Notice of Proposed Rule Making* (“*Third NPRM*”) which proceeding was commenced at the same time the Commission adopted new EEO regulations in *Second Report and Order and Third Notice of Proposed Rule Making*, released November 20, 2002, FCC 02-303 (“*Second R&O*”). The participation of the State Associations in this rule making proceeding is without prejudice to any position any of them may take in connection with the *Second R&O*.

Introduction

On November 20, 2002, the Commission adopted new equal employment opportunity rules and policies for broadcasters (the “new EEO Rule”) as well as for multi-channel video programming distributors. *See Second R&O*. At the same time, the Commission commenced a new rule making. Under its *Third NPRM*, the Commission has sought comment on whether, and if so how, the new EEO rules should be applied to part-time positions. The Commission stated that there was not sufficient evidence in the record to make an informed decision.

The State Associations hereby continue their participation in the subject matter of this proceeding. They have long been active in assisting radio and television stations within their respective borders to practice, on a voluntary basis, broad outreach in their recruitment efforts. Accordingly, the State Associations have never had a quarrel with the goal of broad outreach, only with the government’s role in this area. As the records of this and related proceedings well

evidence, the State Associations continue their efforts to increase the public's awareness of broadcasting as a worthwhile career, as well as to implement numerous workforce development initiatives so that men and women of all racial and ethnic backgrounds will have convenient "career pipelines" to radio and television stations nationwide. Toward that end, the State Associations continue to urge all broadcasters to use the Internet as a universal, common standard, outreach tool for the same reasons that their counterparts in government and all other industries rely so heavily upon the Internet for job postings and job inquiries. When a broadcaster uses the Internet for job outreach, and promotes that fact over the air, the station is providing notice about job openings not only to residents within its listening or viewing area, but also to residents throughout the state, the region, and the nation (indeed throughout the world). Use of the Internet in this way also provides those residents with an easy and timely way to apply for job openings during any convenient time of the day or night and from any location that is convenient, such as the person's home, school, or place of business, the public library, the state unemployment office, an Internet café or similar business, or the home of a relative, friend, classmate, or business associate.

The State Associations remain very concerned about the refusal of the Commission to endorse the Internet as the single widest, most efficient, and most effective methodology for the dissemination of information about job openings. The Commission's refusal unnecessarily forces broadcasters to rely more heavily upon less efficient and less effective dissemination methodologies and, as a consequence, to unnecessarily increase their recordkeeping and reporting burdens. For those reasons, and the reasons that follow, the State Associations strongly oppose any action by the Commission to apply the new EEO Rule to part-time positions.

It is true that the Commission had applied a “substantial compliance” policy to part-time positions in the past. However, there is no known assessment of whether that policy was ever necessary or effective. Furthermore, the new EEO Rule is based on an earlier EEO rule (former “Option A”) that was in effect for only about a year. Not only was that former regulation substantially different than the EEO regulations that were in effect for decades, the regulation containing Option A was so quickly struck down by the Court after enactment that the workability and efficacy of that regulation were never tested and therefore are unknown.

In addition, the recordkeeping and reporting burdens that the new EEO Rule creates with respect to full-time positions are apparent and create certain unintended consequences. There should be no genuine dispute that the greater the number of job openings that are subject to the new EEO Rule, the more recordkeeping that is required and thus the more burdensome the new EEO Rule becomes. Specifically, the new EEO Rule creates new burdens and risks every time a broadcaster seeks to fill a full-time position and thus the regulation creates a disincentive for the broadcaster to fill the opening. Also, the new EEO Rule increases the paperwork burden in direct proportion to the number of referral sources and methodologies used, as well as to the number of times the notice is repeated for any opening. Thus, the regulation also creates a disincentive for the widest possible and most frequent notice of job openings.

Accordingly, any effort to expand the applicability of the new EEO Rule to part-time positions, which positions turn over much more frequently than full-time positions, will increase *exponentially* these problems, thereby resulting not only in fewer job openings to fill overall, but also in less than optimally wide and frequent dissemination of notices as among *all* types of job openings to be filled. This will mean less overall employment in the broadcast industry, and therefore less opportunity for employment regardless of race, ethnicity, and gender.

At bottom, the recruitment, recordkeeping, and reporting requirements of the new EEO Rule favor the economies of scale inherent in consolidation in at least two ways: Consolidation typically means job layoffs which mean fewer job openings which means less paperwork and less regulatory risk. Consolidation also typically means more resources are available to match the burdens and risks created by regulation. The application of the new EEO Rule to part-time positions will increase the current pressure to consolidate. Accordingly, the State Associations strongly recommend that part-time positions be fully exempt from the mandatory recruitment, recordkeeping, and reporting requirements of the new EEO Rule.

Discussion

A. DECADES OF EEO-RELATED ENFORCEMENT HAVE NOT SHOWN ANY NEED TO APPLY, OR VALUE IN APPLYING, THE EEO REGULATIONS TO PART-TIME POSITIONS

The Commission first promulgated EEO regulations in 1969. For some three decades, it has been enforcing those regulations. While the Commission may have applied a “substantial compliance” policy to part-time positions in the past, there is no known reassessment of whether that policy was ever necessary or effective. What is known is that the Commission has consistently refused to hold a station’s record of hiring part-time employees against a station. *See, e.g., Enterprise Media of Toledo, L.P.*, 12 FCC Rcd 3920 at ¶10 (1997) (finding it “inconsequential” that none of a stations’ eleven part-time employees was a minority); *KNOE, Inc.*, 11 FCC Rcd 19655 at ¶17 (1996) (rejecting the assertion that the Commission should consider the licensees' part-time employment record); *Southern Skies Corporation*, 11 FCC Rcd 19176 at ¶12 (1996) (finding allegations regarding part-time hires to be “without merit” as the Commission’s focus is on full-time positions); *WFSQ (FM)*, 7 FCC Rcd 6045 at ¶8 (1992) (disregarding arguments regarding part-time hires stating that the Commission’s EEO analysis

“is directed at efforts made for full-time hires”). Moreover, as the Commission stated when it adopted the formulation of an EEO rule which contained Option A, “[w]e see no reason to depart from this policy [of exempting part-time hires], which serves to minimize burdens on broadcasters, especially smaller broadcasters.” 15 FCC Rcd 2329 at ¶110 (2000). There is no meritorious evidence or legal argument in the record to support a change in that position. In fact, the Commission would be fully justified in declaring that part-time positions remain exempt from the outreach, recordkeeping, and reporting requirements of the new EEO Rule, thereby avoiding altogether the decades old, vexing question as to what would constitute “substantial compliance” with the new EEO Rule.

There is no significant regulatory need for the Commission to broaden its focus and to apply the mandatory outreach/recordkeeping/reporting requirements of the new EEO Rule to part-time positions. A non-exempt station employment unit (“SEU”) must engage in wide dissemination whenever it seeks to hire a permanent full-time employee unless exigent circumstances exist. When such an SEU promotes from within, it must engage in wide dissemination unless the position occupied by the person being promoted was previously the subject of wide dissemination. This requirement applies whether the person is being promoted from one full-time position to another full-time position, from a part-time position to a full-time position, or from a temporary position to a permanent full-time position. Thus, the new EEO Rule already creates an incentive for non-exempt SEU’s to engage in recruitment outreach for part-time positions so that they can avoid the delay that may be occasioned by a full outreach effort in connection with the promotion of a part-time person to a full-time position. For this reason, the extension of the new EEO Rule is unnecessary.

The State Associations recognize that the EEO Supporters have argued in their opening comments in this proceeding that the Communications Act requires the Commission to apply all aspects of the new EEO Rule to part-time positions. The EEO Supporters base their argument on the language of Section 334 of the Act which states that the Commission must “continue applying to television broadcasters and cablecasters the EEO Rule that was in effect on September 1, 1992.”¹ However, the position of the EEO Supporters is fallacious for at least two reasons. First, the D.C. Circuit has twice concluded, notwithstanding Section 334 of the Act, that the two former versions of the Commission’s EEO regulations must be vacated.² In addition, the Commission itself found no statutory bar to suspending portions of the former EEO rules that the court did not vacate. In short, the Commission is not even required to re-adopt EEO regulations. Surely if it is not required to re-adopt such regulations, it is not prevented from modifying them as it has done. Second, in any event, the focus of the Commission’s EEO rules has never been on part-time positions. As the Commission has repeatedly stated, “[a]lthough our EEO Rule requires broadcasters to provide equal employment opportunity with respect to all positions, our primary focus is on efforts for full-time vacancies when analyzing EEO programs.”³ Accordingly, it is unreasonable to construe the statute as preventing the Commission from

¹ Comments of EEO Supporters, dated December 20, 2002 at 3, *citing Report and Order*, 15 FCC Rcd 2329 (2000), *recon. denied*, 15 FCC Rcd 22548 (2000).

² *See Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344, 353, *reh’g denied*, 154 F.3d 487, *reh’g en banc denied*, 154 F.3d 494 (D.C. Cir. 1998); *MD/DC/DE Broadcasters Ass’n v. FCC*, 236 F.3d 13, *reh’g denied*, 253 F.3d 732 (D.C. Cir. 2001), *cert. denied*, 122 S.Ct. 920 (2002) (“*State Broadcasters*”).

³ *Radio Chattanooga, Inc.*, 10 FCC Rcd 9773 at ¶8 (1995). *See also, Enterprise Media of Toledo, L.P.*, 12 FCC Rcd 3920 (1997); *KNOE, Inc.*, 11 FCC Rcd 19655 (1996); *Southern Skies Corporation*, 11 FCC Rcd 19176 (1996); *WFSQ (FM)*, 7 FCC Rcd 6045 (1992).

continuing to retain its primary focus on full-time positions and, thus, to exempt part-time positions from the outreach, recordkeeping, and reporting requirements of the new EEO Rule.

B. WITHOUT ADEQUATE OPERATIONAL EXPERIENCE UNDER THE NEW EEO RULE, THE RISK IS TOO GREAT THAT AN EXTENSION OF THE RULE TO PART-TIME POSITIONS WILL BE DESTRUCTIVE OF THE PURPOSE AND PRIMARY FULL-TIME FOCUS OF THE NEW EEO RULE

The new EEO Rule is largely based on Option A of the EEO rule which was adopted on September 11, 2000. *See Report and Order*, 15 FCC Rcd 2329 (2000), *recon. denied*, 15 FCC Rcd 22548 (2000) (the “2000 EEO Rule”). However, as a result of the court’s decision in *State Broadcasters*, the Commission suspended the outreach prong of the 2000 EEO Rule on January 30, 2001. Accordingly, that aspect of the 2000 EEO Rule was in effect for only about a year. During that short period of time, the Commission certainly did not have an adequate opportunity to evaluate the workability or efficacy of any aspect of the 2000 EEO Rule.

The EEO Rule contains a strong internal disincentive for stations to practice the widest possible dissemination and to fill all full-time positions. Accordingly, the new EEO Rule needs to be monitored in practice before there is any serious effort to expand its application. The outreach component of the new EEO Rule contains three prongs: (i) a core obligation to widely disseminate information about all full-time job openings; (ii) an obligation to provide notice of such job openings to organizations which have requested to be placed on the station’s “mailing list;” and (iii) an obligation to engage in a minimum number of non-vacancy specific “menu” options that are intended to expand employment opportunities generally. In addition, the performance of these obligations must be recorded in great detail, that detailed data must, in turn, be tabulated and those tabulations must be converted into reports that will be placed in a station’s public inspection file, posted on its web site and filed with the Commission. Each time a non-

exempt SEU has a full-time opening to fill, the recruiting component is triggered along with the first two prongs and attendant recordkeeping requirements. The disincentive for stations to practice the widest possible outreach and to fill every full-time position is apparent under the new EEO Rule:

1. For each full-time opening that will be filled, each non-exempt SEU must keep a copy of every job vacancy announcement, with the effect that the greater the number of announcements distributed, the greater the amount of recordkeeping that will be required.

2. For each full-time opening that will be filled, each non-exempt SEU must keep detailed information identifying to whom each announcement was sent, with the effect that the wider the dissemination, the more recordkeeping that will be required.

3. For each full-time opening that will be filled, each non-exempt SEU must keep detailed information identifying the dates and times that media, including the Internet, were used to publicize each announcement, with the effect that the more diverse and frequent the dissemination, the more recordkeeping that will be required.

4. For each organization that has asked the broadcaster to send it job vacancy information (a “Referral Organization”), each non-exempt SEU must keep detailed information identifying the organization, contact person and contact information, with the effect that the greater the number of organizations responding, the more information the station needs to keep track of, the greater the opportunity for error and the greater the amount of recordkeeping that will be required.

5. For each full-time opening that is to be filled, each non-exempt SEU must keep detailed information as to which Referral Organizations and other organizations were sent what announcements, with the effect that the more diverse and frequent the dissemination, the more recordkeeping that will be required.

6. For each full-time opening filled, each non-exempt SEU must record and report to the FCC all vacancies filled during the preceding year, with the effect that the greater the number of vacancies filled, the greater the amount of recordkeeping and reporting that will be required.

7. For each full-time opening filled, each non-exempt SEU must record and report to the FCC all outreach sources and methodologies (including name, address, contact person and telephone number) used to recruit for the vacancy, with the effect that the greater the number of sources and methodologies used, the greater the amount of recordkeeping and reporting that will be required.

8. For each full-time opening filled, each non-exempt SEU must record and report to the FCC the outreach source that referred the hire, with the effect that the greater the number of full-time hires, the greater the amount of recordkeeping and reporting.

9. For each full-time opening filled, each non-exempt SEU must record and report to the FCC data reflecting the total number of persons interviewed for the vacancy and the total number of interviewees from each source used to recruit for the vacancy, with the effect that the greater the number of interviews, the greater the amount of recordkeeping and reporting that will be required.

10. For each non-vacancy specific “menu” option initiative, each non-exempt SEU must document and report a list containing a brief description, with the effect that the greater the number of initiatives, the greater the amount of recordkeeping and reporting that will be required.

In short, every time a station has a full-time job opening to fill, the act of trying to fill the opening will trigger the need to comply with numerous paperwork and other requirements which, in turn, will create an event of exposure to third-party and FCC scrutiny. The fact that the

Commission has refused to accept the Internet with its real time, geographic, and paperless efficiencies as an acceptable, uniform, standardized dissemination methodology exacerbates the problem. Broadcasters who are already thinking about the need for new hires, will now have one more risk adverse justification to avoid making additional hires. That disincentive would be driven deeper into staff ranks if the mandatory recruitment, recordkeeping, and reporting requirements of the new EEO Rule were expanded to include part-time positions.

The fact that the mandatory recruitment, recordkeeping, and reporting requirements will work at cross-purposes to the goal of widest possible and most frequent dissemination should be plain. Inescapably, broadcasting is a business. Its advertisers have many options for their messages. Its audience has many other options for information and entertainment. If the revenues of a radio or television station do not meet or exceed expenses on a regular basis, the owner is faced with doing things that it can readily control such as cutting costs, going dark, or selling out. Employee payroll is the largest component of expense for virtually every business, including broadcasting. The broadcast industry's unavoidable preoccupation with keeping revenues above expenses already forces broadcasters to look for ways to reduce expenses everywhere they can. Employee layoffs are a classic response. A decision to use syndicated programming rather than live programming is another. A decision not to staff up again after layoffs is a further hold-the-line-on-expenses response. Hiring part-time employees rather than full-time employees is another way to save money. Taking on temporary employees, rather than permanent full-time or part-time workers, is another response. Engaging only independent contractors is but another. Combining staffs and consolidating is another.

The regulatory burdens and risks created by the new EEO Rule will exacerbate this problem. The Commission's recruitment, recordkeeping, and reporting requirements for full-

time positions will mean fewer full-time openings. This in turn will mean fewer full-time employees hired than might otherwise be the case. If the mandatory requirements of the new EEO Rule are extended to part-time positions, this too will mean fewer part-time positions and fewer part-time employees hired than would otherwise be the case. It is common knowledge that the turnover rate for part-time employees is much higher than for full-time employees.⁴

Accordingly, if an SEU's workforce is comprised of fifteen full-time employees and five part-time employees, the higher turnover rate among part-time employees could have the effect of doubling or tripling the overall turnover rate of a station comprised of only full-time employees! What will stations do to reduce the regulatory impact of such a high turnover rate? As mentioned, stations will certainly use more syndicated programming rather than originally produced programming. They will hire more temporary help rather than permanent help. They will have more independent contractor relationships. And more of them will LMA their stations with, or even sell out to, station group owners to reduce costs and achieve greater economies of scale. All this will mean more contraction in the number of jobs available.

If the Commission truly cares about the health of the broadcast industry and about expanding opportunities for broadcast employment generally, it needs to focus on ways to create a regulatory environment that makes it easier for broadcasters to survive and compete, particularly smaller broadcasters, so that such broadcasters have the economic need to hire more people. At the least, the Commission must avoid taking any actions that would discourage stations from creating new jobs. For these reasons alone, the Commission should, on its own initiative, revisit its *Second R&O*. At the least, the Commission should not compound the

⁴ See, e.g., Susan Houseman, Senior Economist at the W.E. Upjohn Institute for Employment Research and Anne E. Polivka, Research Economist in the Office of

problem by extending its mandatory recruitment, recordkeeping, and reporting requirements to part-time positions where the incidence of turnover is very high.

The organizations which continue to urge the Commission to re-adopt worn EEO regulations, and now to expand the applicability of those EEO regulations to part-time positions, have lost sight of what really counts – job creation. The Commission’s regulations do not create industry jobs. Only a healthy business and favorable regulatory climate will do that. Equally certain is that unwarranted and counterproductive regulations, as here, will deter the creation of new jobs and speed the further elimination of jobs in the broadcast industry by placing more pressure on stations to consolidate. Those logical consequences undermine the basic premise for the entire *Second R&O*, namely that equal employment opportunity only has meaning when there are job openings for which to apply.

The Commission professes to be concerned about the effects of consolidation. Yet at the same time that the Commission is engaged in measuring the effects of consolidation and trying to strengthen individual and smaller group station ownership, so that these owners can survive and compete in the marketplace without having to sell out and consolidate, the Commission seriously undercuts this effort by injecting a new regulatory disincentive for stations to stay independent. The large group owners typically have the resources to bear even the unreasonable burdens of extensive and time consuming recordkeeping and reporting as well as governmental scrutiny. Smaller owners cannot afford either the staff required to meet those unreasonable burdens or the forfeitures likely to arise from EEO-related paperwork shortcomings. Extending these burdens and risks to part-time positions will only exacerbate the problem, resulting in increased consolidation and less competition in the broadcast industry.

Implications of Flexible Staffing Arrangements, in On the Job (David Neumark, 2000).

Conclusion

Based on the foregoing, the Commission should not extend the applicability of the mandatory recruitment, recordkeeping, and reporting requirements under the new EEO Rule to part-time positions.

Respectfully submitted,

Alabama Broadcasters Association,
Alaska Broadcasters Association,
Arizona Broadcasters Association,
California Broadcasters Association,
Colorado Broadcasters Association,
Connecticut Broadcasters Association,
Florida Association of Broadcasters,
Georgia Association of Broadcasters,
Hawaii Association of Broadcasters,
Idaho State Broadcasters Association,
Illinois Broadcasters Association,
Iowa Broadcasters Association,
Kansas Association of Broadcasters,
Kentucky Broadcasters Association,
Louisiana Association of Broadcasters,
Maine Association of Broadcasters,
Maryland/ DC/Delaware Broadcasters
Association,
Massachusetts Broadcasters Association,
Michigan Association of Broadcasters,
Minnesota Broadcasters Association,
Missouri Broadcasters Association,
Montana Broadcasters Association,
Nebraska Broadcasters Association,
Nevada Broadcasters Association,
New Hampshire Association of
Broadcasters,
New Jersey Broadcasters Association,
New York State Broadcasters
Association, Inc.,
North Dakota Broadcasters Association,
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Oklahoma Association of Broadcasters,
Oregon Association of Broadcasters,

Pennsylvania Association of Broadcasters,
South Carolina Broadcasters Association,
South Dakota Broadcasters Association,
Tennessee Association of Broadcasters,
Texas Association of Broadcasters
Utah Broadcasters Association,
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January 16, 2003

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